

July 5, 2005

Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Mr. Hammerschmidt:

As an organization representing over 1000 cattle producers in South Dakota we appreciate the opportunity to comment on the proposed National Animal Identification System. Our concerns center around cost, identification methods, and producer involvement, specified below:

Cost

- Costs of developing the infrastructure should be borne by the government, and operational costs should be borne by both producers and the government. If confidentiality is a concern with a government-funded program we prefer that it be funded privately.
- Premise registration should be funded by the government and overseen by the state.
- The system must be able to evolve with changes in technology and information without major costs or renovation.

Identification Methods

- ID methods should be market-driven. RFID is currently the method of choice, and we support that, but if new technology emerges that is more efficient or effective and the market supports it, the system needs to be able to adapt.
- All information must be electronically transferable.
- Our traceback goal should be 24 hours instead of 48. This would facilitate more timely reporting of animal movements.
- All cattle should be assigned an individual and unique ID number. If cattle are moved in groups or lots the individual animal number should be linked to the group/lot number since cattle rarely remain in the same group or lot for life.
- Brands and inspection systems are not adequate. The scope of this plan renders a brand inspection system inefficient and cumbersome. The cost of employing brand inspectors alone would be prohibitive. Because the same brand can be registered to different people in different states and not all states require branding, the possibility for massive confusion exists if brand inspection is to be part of a national animal ID system. While the exact type of electronic identifier needn't be stipulated, it needs to be clear that all ID methods need to be capable of being electronically read and transferred.

- Our current policy is in support of a voluntary system. However, we understand that a mandatory system may be necessary at some point to ensure full traceability, which we believe is of the utmost importance.

Producer Involvement

- We support the system developed by the National Cattlemen's Beef Association that will be operational by this fall. We ask and encourage USDA to utilize this system since it is already in place and has been designed by those of us who will be using it – producers. Use of this system would also address our concerns with the lack of confidentiality of a government-held database. If you choose to reinvent the wheel, so to speak, we ask that the national ID system at least be compatible with NCBA's system so those who are already using it don't have to make major changes to their management methods.
- We ask that producer groups continue to be involved in the planning and development of this system. We recommend producer involvement even after the system is operational. Seeking producer feedback throughout the entire process and operation will allow for continuous improvement.

As noted above, our biggest concerns are ensuring confidentiality, efficiency and cost-effectiveness.

Thank you for the opportunity to share our concerns regarding the National Animal Identification System. As cattle producers we have a major stake in the future of such a program. We hope these comments are helpful and that you will not hesitate to contact us if more information is needed.

Sincerely,
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